

Briefing with RA
Tuesday July 14, 2015
11:00-11:30 am

A. Status of Requirements in Corrective Action Plan

1. Drinking Water Well Evaluations/Well Shut ins

- Category 1 (total 532 wells) – due May 15, 2015
 - I. Group of 176 Category 1 wells – confirmed all sub 3000
 - Most evaluations were completed by date
 - 30 needed additional review, now complete
 - State advises it will shut in 3 additional wells (Chevron) – in negotiations with Chevron
 - Total shut ins 23 +3 = 26
 - EPA staff has no significant outstanding questions on this well category
 - II. Group of 356 Category 1 wells – not sub 3000 upon further review
 - 59 dropped off - >10,000 or never injected, etc.
 - Remaining 297 further screened (3000-10000)
 - 207 meet criteria for concern for dw (screened at depth less than 1500' bgs) - of these, 61 are listed as idle
 - Information orders, etc. in process, final evaluation to be completed.
 - Staff is reviewing these spreadsheets
- Category 2 evaluation – due July 31, 2015 – (now includes 3600 cyclic steam {CS} wells) - on track for the non CS wells. The CS wells will NOT be screened by July 31 because they are not associated with a project; DOGGR doesn't have TDS info. The Water Board did promise to complete review of all wells that DOGGR submits to them.
- Category 3 evaluation – due Feb 15, 2016

2. Aquifer Exemptions

- a. Workshops conducted in Feb and March 2015
- b. Guidance Issued on April 2, 2015
- c. 7/15/15 deadline for all proposed AE packages into sub 3000 to avoid Oct 15 shut in – WILL MISS (We need to be clear that this is not a compliance deadline- it was a target for the state (and operators) to meet to avoid shut-ins in Oct.
 - Wells likely will be shut in in Oct (# not known), can apply and be re-opened.
 - Expecting 1-3 AE packages in coming months.
 - Arroyo Grande is the first expected, courtesy copy mid-August – covers a few disposal wells and more than 150 cyclic steam into sub 3000 fm; expansion of HC bearing zone exempted at primacy.
- d. AE evaluation for 11 HTAE due 7/15/15

3. Rulemaking

- a. Emergency Rulemaking – in effect; expires on Oct. 20, 2015, but could be reissued thru April 19, 2016
- b. Permanent Rulemaking – public comment closes July 16

4. Regulatory Revisions/Program Improvements – plan expected 7/15/15

- 5. **Database** – DOC expects \$20 million over time to upgrade information systems / priority treatment. Expect completion of GIS shape files in 3 years.

B. Additional Topics

- 1. Communication Strategy
- 2. Lawsuits/SB 83
- 3. Resources

Notes:

Category 1 – disposal wells injecting into non -exempt, non HC zones, including the 11 HTAE

Category 2 – EOR wells injecting into non -exempt, HC zones

Category 3 – disposal and EOR wells injecting within the surface boundary of an exempted aquifer, but maybe not injecting at depth into an exempted zone, per the Primacy Application Volumes I, II and III.

HTAE – historically treated as exempt, per the Covington letter, 1995.